

DOCKET SECTION

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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POSTAL RATE AND FEE CHANGES, 1997 :

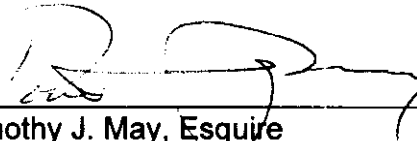
Docket No. R97-1

**RESPONSES OF PARCEL SHIPPERS ASSOCIATION (PSA) WITNESS ZWIEG
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

The Parcel Shippers Association (PSA) hereby provides PSA witness Zwieg's responses to the following interrogatories of United Parcel Service: UPS/PSA-T3-1-3.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,



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Dated: February 6, 1998

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UPS/PSA-T3-1. Please refer to page 3, Table 1, of your testimony.

(a) The second column is titled "Average number of days from the facility to home." Please confirm that the "facility" referred to is a BMC in the first row, and SCF in the second row. If not confirmed, please explain to what "facility" refers.

(b) Please confirm that the BMC row should be interpreted to mean that it takes an average of 7.93 days from the time mail is entered at the BMC to the time of final delivery.

RESPONSE.

(a) Yes, the first row refers to BMC facilities and the second row refers to SCF facilities.

(b) The BMC row refers to the average delivery time from entry at the BM facility to delivery in the customer's home. The average is 7.93 days.

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UPS/PSA-T3-2. Please identify and provide any documents that describe or analyze in more detail your seed tracking program.

RESPONSE. Our seed program consists of 500 responders who are located nationwide. Each is strategically selected to represent zip codes most frequently mailed to by direct mailers. Responders have predominantly residential addresses. Arrivals at destination postal facilities are confirmed using the DSAS appointment system through the USPS. Responders log receipts via an 800 number. The dates of the arrivals at destination postal facilities and the receipt by responders are recorded on a tracking document with the delivery time in days.

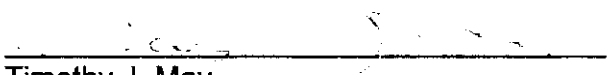
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UPS/PSA-T3-3. What is the source of the figures in Tables 2, 3, 4, and 5?

RESPONSE. The source of the figures in Tables 2, 3, and 4 are actual customer data supplied by Parcel/Direct prospective clients (Customer Data). Calculations were output from Parcel/Direct sortation and distribution programs. All such data we regard as highly confidential. The source for the data in Table 5 is a study produced by Quad/Graphics Transportation Department.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



Timothy J. May

Dated: February 6, 1998